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Holdings and W. Quay Hays*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

GREEN RENEWABLE ORGANIC AND
WATER HOLDINGS, LLC D/B/A GROW
HOLDINGS AND W. QUAY HAYS,

Plaintiffs,

v.

BLOOMFIELD INVESTMENTS, LLC and
DOES 1 through 20, inclusive,

Defendants.

Case No. 4:21-cv-07181-HSG

**STIPULATION TO EXTEND TIME
FOR PLAINTIFF TO AMEND
COMPLAINT AND FOR DEFENDANT
TO RESPOND TO AMENDED
COMPLAINT; ORDER**

Judge: Hon. Haywood S. Gilliam, Jr.

1 WHEREAS, on August 18, 2021, plaintiffs Green Renewable Organic and Water
2 Holdings, LLC d/b/a Grow Holdings (“Grow Holdings”) and W. Quay Hays served a complaint
3 filed in the Superior Court of California for the County of Napa seeking declaratory relief on
4 defendant Bloomfield Investments, LLC (“Bloomfield”); and

5 WHEREAS, on September 16, 2021, Bloomfield removed the state court action to the
6 district court; and

7 WHEREAS, on September 23, 2021, Bloomfield filed a motion to dismiss the complaint
8 with a hearing date noticed for February 10, 2022; and

9 WHEREAS, on October 6, 2021, the parties stipulated and agreed to extend the deadline
10 for plaintiffs’ response to the motion to dismiss to October 21, 2021; and

11 WHEREAS, the Court accepted the parties’ stipulation and ordered that plaintiffs’ response
12 to the motion to dismiss be extended to October 21, 2021; and

13 WHEREAS, plaintiffs seek to file an amended complaint in lieu of a response to the
14 motion to dismiss;

15 IT IS THEREFORE STIPULATED AND AGREED that plaintiffs may file an amended
16 complaint on October 21, 2021;

1 IT IS FURTHER STIPULATED AND AGREED that Bloomfield's deadline to respond
2 to the amended complaint be extended to November 12, 2021.

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4 Dated: October 21, 2021

5 GREEN RENEWABLE ORGANIC AND
6 WATER HOLDINGS, LLC D/B/A GROW
7 HOLDINGS AND W. QUAY HAYS


8 By: /s/ Mark D. Flanagan
9 Mark D. Flanagan (SBN 130303)

10 BLOOMFIELD INVESTMENTS, LLC and
11 DOES 1 through 20, inclusive

12 By: /s/ Charles C. Correll, Jr.
13 CHARLES C. CORRELL, JR. (SBN 258085)

14 IT IS SO ORDERED.

15 Date: October 21, 2021

16 
17 Hon. Haywood S. Gilliam, Jr.
18 United States District Judge
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